

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

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2005 APR -8 A. 11:13

U.S. DISTRICT COURT
DISTRICT OF MASS.

CHAMPION MORTGAGE, A DIVISION OF)
KEY BANK, USA NATIONAL ASSOCIATION)
Plaintiff)

VS.)

IDA M. GREEN, ESTATE OF)
JAMES C. GREEN, JR., MASSACHUSETTS)
DEPARTMENT OF REVENUE,)
INTERNAL REVENUE SERVICE,)
MASSACHUSETTS DEPARTMENT OF)
REVENUE – ESTATE TAX DIVISION,)
FAIR LABOR AND BUSINESS PRACTICES)
DIVISION OF THE OFFICE OF THE)
MASSACHUSETTS ATTORNEY GENERAL,)
GLORIA ROSCOE, FRANCISCO DePINA)
Defendants)

CIVIL ACTION NO. 05-10375 WGY

Formerly
Suffolk Superior Court
C.A. No. 04-5291

REQUEST FOR DEFAULT Rule 55(a)

I, Edward P. McCarthy, attorney for the above-named plaintiff, Champion Mortgage, a division of Key Bank, USA National Association, state that the Complaint in this action was filed on December 4, 2004 with the Suffolk Superior Court.

The Summons and a copy of the Complaint were served on the following Defendants and appear on the officers' returns as follows:

DEFENDANT

DATE OF SERVICE

(1) Ida M. Green
1709 Deerwood Drive
Augusta, GA 30906

1/12/2005

DEFENDANT

DATE OF SERVICE

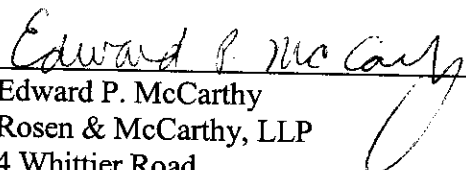
- | | |
|---|-----------|
| (2) Estate of James C. Green, Jr.
c/o Ida M. Green
1709 Deerwood Drive
Augusta, GA 30906 | 1/12/2005 |
| (3) Gloria Roscoe
33 Wales Street #201
Dorchester, MA 02124 | 1/10/2005 |
| (4) Francisco DePina
282 Walnut Street #3
Roxbury, MA 02118 | 1/10/2005 |

That the above-referred Defendants herein have failed to serve a responsive pleading or to otherwise defend as provided by MRCP 12 and FRCP 12.

Therefore, I request that Default be entered against the above-named Defendants in this action.

Signed under the pains and penalties of perjury this 7th day of April, 2005.

Champion Mortgage, a division of Key Bank, USA
National Association
By its Attorney,



Edward P. McCarthy
Rosen & McCarthy, LLP
4 Whittier Road
Natick, MA 01760
(508) 907-6444 x207
BBO # 555115

Champion Mortgage, a division
of Key Bank, USA, N.A.

vs.

Ida M. Green, et al.

Civil Action No. 05-10375 WGY

CERTIFICATE OF SERVICE

I, Edward P. McCarthy, upon oath do hereby depose and say that on April 7, 2005 I served copies of the Request for Default by mailing a copy of same postage prepaid to the following:

Ida M. Green
1709 Deerwood Drive
Augusta, GA 30906

Estate of James C. Green, Jr.
c/o Ida M. Green
1709 Deerwood Drive
Augusta, GA 30906

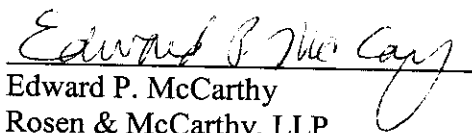
Gloria Roscoe
33 Wales Street #201
Dorchester, MA 02124

Francisco DePina
282 Walnut Avenue #3
Roxbury, MA 02118

United States of America
Office of the United States Attorney
One Courthouse Way, Suite 9200
Boston, MA 02210

United States of America
U.S. Department of Justice
Tax Division
P.O. Box 55, Ben Franklin Station
Washington, D.C. 200441
ATTN: Lydia Bottome-Turanchik, Esq.

Massachusetts Department of Revenue
Counsel to the Commissioner
Litigation Bureau - P.O. Box 9565
100 Cambridge Street
Boston, MA 02114-9565
ATTN: Eileen Ryan McAuliffe, Esq.


Edward P. McCarthy
Rosen & McCarthy, LLP
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Natick, MA 01760
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